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June 13, 2022

Application GRANTED. The motion schedule proposed by defense counsel is hereby adopted. The pretrial conference, currently scheduled for June 27, 2022, is adjourned to August 31, 2022, at 3:00 p.m.. Time is excluded in the interests of justice from today, June, 14, 2022 until August 31, 2022 for the reasons set forth in defense counsel's letter. The parties should not expect any further extensions or adjournments. The Clerk of Court is directed to terminate Doc. #21. SO ORDERED.

BY ECF

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Malek Mohammad Balouchzehi
21 Cr. 658 (JMF)



June 14, 2022

Dear Judge Furman:

Robert Soloway and I represent Mr. Balouchzehi in the above-named matter. This letter is respectfully submitted with the consent of the government, by AUSA Kimberly Ravener, to request an adjournment of the pretrial conference presently scheduled for June 27, 2022 at 3:15 p.m., as well as a corresponding extension of the current motion deadlines, by approximately sixty days.

While the parties have been actively working to reach a disposition in this matter, those efforts have been delayed due to the parties' respective trial schedules in other criminal matters. We nonetheless continue to engage in plea negotiations, but additional time is needed in order to reach a potential disposition. For this reason, it is respectfully requested that the pretrial conference be adjourned and the corresponding motion deadlines be extended in accordance with the following proposed schedule:

Pretrial Conference: August 29, 2022

Motions Due: August 19, 2022

Oppositions Due: September 2, 2022

Replies Due: September 9, 2022

Mr. Balouchzehi consents to the exclusion of time under the Speedy Trial Act.

Hon. Jesse M. Furman
June 13, 2022
Page Two

If the Court has any questions regarding this application please do not hesitate to contact me. The Court's time and attention to this matter is appreciated.

Respectfully submitted,

/s/

David Stern

cc: All counsel (by ECF & Email)